

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:20 CR 329 SRC
)	
GARY PRIMM, JR.,)	
)	
Defendant.)	

JOINT STIPULATIONS OF THE PARTIES

COMES NOW, the United States of America, by and through the United States Attorney for the Eastern District of Missouri, Saylor A. Fleming, and Kyle T. Bateman and John J. Ware, Assistant United States Attorneys for said district, and Gary Primm, Jr., by and through his attorneys Justin K. Gelfand and Gregory P. Bailey, and submit the following joint stipulations for trial:

The parties stipulate and agree that the following facts are true, may be read to the jury, and may be shown as an exhibit to the jury at trial during either party's case-in-chief:

1. During 2014 and 2015, Gary Primm, Jr. was a member and owner of United Auto Defense, LLC, a Georgia limited liability company.
2. During 2014 and 2015, Gary Primm, Jr. was a member and owner of International Megalodons, LLC, a Missouri limited liability company.

The parties stipulate and agree to the authenticity and other foundational requirements of the following documents, subject to possible Federal Rules of Evidence Rule 401 and 403

objections, among others, at the time the parties seek to introduce such records:

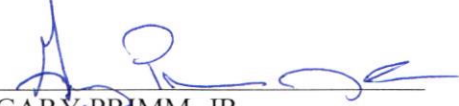
1. State of Georgia, Secretary of State, Records for United Auto Defense, LLC
2. State of Missouri, Secretary of State, Records for United Auto Defense, LLC
3. State of Missouri, Secretary of State, Records for International Megalodons, LLC
4. IRS Form 1120 for United Auto Defense for 2012 tax year
5. IRS Form 4868 for Gary Primm for 2014 tax year
6. IRS Form 4868 for Gary Primm for 2015 tax year
7. Form W2s prepared by Paylocity for 2014 and 2015 tax years
8. Records related to Bank of Old Monroe account ending in #7501 held in the name of Gary D Primm Jr
9. Records related to US Bank account ending in #1337 held in the name of Gary D Primm
10. Records related to Regions Bank account ending in #5739 held in the name of International Megalodons LLC
11. Records related to Regions Bank account ending in #3149 held in the name of International Megalodons LLC
12. Records related to Regions Bank account ending #2080 held in the name of United Auto Defense LLC
13. Records related to Regions Bank account ending #6062 held in the name of United Auto Defense LLC
14. Records related to Regions Bank account ending #5763 held in the name of United Auto Defense LLC

15. Records related to Wells Fargo account ending in #6819 held in the name of Gary Primm
16. "Plain language" Account Transcript for Gary Primm for 2014 tax year
17. "Plain language" Account Transcript for Gary Primm for 2015 tax year
18. "Plain language" Account Transcript for United Auto Defense LLC for 2013 tax year
19. "Plain language" Account Transcript for United Auto Defense LLC for 2014 tax year
20. IRS Correspondence Dated October 16, 2014, to United Auto Defense LLC
21. IRS Instructions for 2014 tax year Form 1040
22. IRS Instructions for 2015 tax year Form 1040
23. IRS Instructions for 2014 tax year Form 1120
24. Blank IRS Form 4868 for tax year 2014
25. Blank IRS Form 4868 for tax year 2015

Respectfully submitted,

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s/ Kyle T. Bateman
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GARY PRIMM, JR.
Defendant

/s/ Justin K. Gelfand

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